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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIARyan G. Little
3381 Holme Avenue

17 4483

Philadelphia, PA 19114,
(In the space above enter the full name(s) of the plaintiff(s).)

Plaintiff

- against -

Charles Ramsey, Former Police Commissioner
John Doe, Arresting OfficerCOMPLAINTJury Trial: ☒ Yes ☐ No

(check one)

Philadelphia, Police Department
Philadelphia Police Headquarter
8th And Race Streets
Philadelphia, PA 19106;Mayor Jim Kenney
Michael Nutter, Former Mayor
City of Philadelphia
600 City Hall
Philadelphia, PA 19107,Seth Williams, Former District Attorney
District Attorney's Office
2 Penn Square
Philadelphia, PA 19103; and,

Defendants

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Ryan G. Little
	Street Address	3381 Holme Avenue
	County, City	Philadelphia, PA
	State & Zip Code	19114
	Telephone Number	

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Charles Ramsey, former Police Commissioner
 Street Address 8th And Race Streets
 County, City Philadelphia, PA 19106
 State & Zip Code Pennsylvania

Defendant No. 2

Name John Doe, Arresting Officer
 Street Address 8th And Race Streets
 County, City Philadelphia
 State & Zip Code Pennsylvania 19106

Defendant No. 3

Name Mayor Jim Kenney
 Street Address 600 City Hall
 County, City Philadelphia
 State & Zip Code Pennsylvania 19107

Defendant No. 4

Name Michael Nutter, former Mayor
 Street Address 600 City Hall
 County, City Philadelphia
 State & Zip Code Pennsylvania 19107

(See Page Attached)

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

The Fourth Amendment and Fourteenth Amendment of the U.S. Constitution and the 8th Amendment of the U.S. Constitution.

— Continuation —

Defendant No. 5:

City of Philadelphia
600 City Hall
Philadelphia, PA 19107

Defendant No. 6:

Seth Williams, Former District Attorney
District Attorney's Office
2 Penn Square
Philadelphia, PA 19103

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? City OF Philadelphia
in the State OF Pennsylvania.

B. What date and approximate time did the events giving rise to your claim(s) occur? The events
occurred about 3/11/08 but the cause of action arose
in 2016 when the Plaintiff's conviction was reversed and vacated,
See Heck v. Humphrey, 1994.

C. Facts: See Facts Attached.

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

Facts

1) The Plaintiff was a resident of Philadelphia County in the State of Pennsylvania in the United States of America at the time that these causes of action arose;

2) The Defendants, Jim Kenney, Mayor, Michael Nutter, Former Mayor, Seth Williams, Former District Attorney, Charles Ramsey, Former Police Commissioners and John Doe, Arresting Officer were state actors working for the City of Philadelphia and the State of Pennsylvania within scope of employment when these causes of action arose;

3) The City of Philadelphia was a municipal corporation in Philadelphia County at the time that these causes of action arose;

4) On or about March 11, 2008, the Defendant, John Doe, a Philadelphia Police Officer falsely, maliciously, and unlawfully arrested and charged the Plaintiff, Ryan G. Little, with possession with intent to deliver a controlled substance;

5) The Plaintiff was subsequently convicted of the possession with intent to deliver a controlled substance and served over 2 years incarcerated in jail or prison;

6) However, it was later discovered and proved that the Defendant, John Doe, the arresting officer and other narcotics unit police officers had falsely, maliciously, and unlawfully accused

a multitude of citizens in the City of Philadelphia with narcotic sales, had planted illegal drugs on citizens in order to arrest them with drug crimes, had stole money from citizens suspected of selling illegal drugs, had took illegal drugs from citizens which were not turned in to the police department, and had done other illegal or unlawful acts in wrongly charging Philadelphia citizens with drug crimes;

7) That the Plaintiff was falsely, maliciously, and unlawfully charged with possession with intent to deliver a controlled substance by John Doe, Arresting Officer, and the Plaintiff served over 2 years incarcerated based upon the false charge filed by John Doe, a Philadelphia Narcotic Police Officer;

8) That as a result of paragraphs #6 and #7 John Doe, the arresting officer and several other narcotics officers were arrested, charged, and prosecuted for public corruption and other crimes in criminal court;

9) In 2016, President Judge Woodskipper in the Court of Common Pleas "reversed and vacated" the Plaintiff's possession with intent to deliver a controlled substance conviction and exonerated him from the charges filed against him by John Doe, the arresting officer;

10) According to the Philadelphia Daily News, 638 criminal convictions were reversed and a multitude of pretrial detainees charges were dismissed as a result of John Doe and other narcotic unit police officers' unlawfully and illegal acts or omissions;

11) That the Defendant, Seth Williams, and the District Attorney's Office knew or should have known that John Doe and other narcotics officers had falsely, maliciously, and unlawfully charged the Plaintiff and other citizens with drug offenses but prosecuted the Plaintiff and other citizens anyway to secure criminal convictions for their records;

12) That the Defendant, Seth Williams, conspired with John Doe and other narcotic police officers to wrongly charge the Plaintiff and other citizens with drug crimes;

13) That Mayor Jim Kenney, Michael Nutter, Former Mayor, and Charles Ramsey, Former Police Commissioner knew or should have known that John Doe and other narcotic police officers employed by the City of Philadelphia Police Department had falsely, malicious, and unlawfully charged citizens with drug crimes but did nothing to stop it and allowed, permitted, or encouraged the practice to continue knowing that it was unconstitutional;

14) That the City of Philadelphia, Mayor Jim Kenney, Michael Nutter, Former Mayor, Charles Ramsey, Former Police Commissioner, and Seth Williams, Former District Attorney had a custom, policy, usage, or practice of allowing, permitting, or encouraging John Doe and other narcotic unit police officers in the City of Philadelphia to falsely, maliciously, and unlawfully charge citizens of Philadelphia with drug crimes and did nothing to stop it after being informed of this unlawful practice;

15) That the Plaintiff was innocent and John Doe, arresting officer and Seth Williams, Former District Attorney had no probable cause to arrest and prosecute the Plaintiff for possession with intent to deliver a controlled substance;

16) That in 2016 President Judge Woodskipper "reversed and vacated" the Plaintiff's conviction for the drug crimes charged by John Doe and exonerated the Plaintiff;

17) The Defendants' actions or omissions in paragraphs #4 through #16 violated the "4th Amendment of the U.S. Constitution";

18) The Defendants' actions or omissions in paragraphs #4 through #16 violated the Plaintiff's "8th Amendment Right to be free from cruel and unusual punishment";

19) The Defendants' actions or omissions in paragraphs #4 through #16 violated the Plaintiff's "14th Amendment Right to Due Process of Law";

20) The Defendants are liable for "malicious prosecution" based upon the facts in paragraphs #4 through #16;

21) That the Defendants are liable for "false imprisonment" based upon the facts in paragraphs #4 through #16;

22) That the Defendants, City of Philadelphia, Mayor Jim Kenney, Michael Nutter, Former Mayor, and Charles Ramsey, Former Police Commissioner, and Seth Williams, Former District Attorney are liable for "negligently" failing to supervise, train, instruct, and control John Doe with regard to the lawful manner to make arrest;

23) In 2016, Judge Woodskipper "reversed and vacated" the Plaintiff's conviction and exonerated him, and the Defendants are liable under Heck v. Humphrey, 1994; and,

24) As a direct and proximate result of the Defendants' actions or inactions, the Plaintiff suffered the following damages: loss of enjoyment of life, loss of consortium, mental distress, physical injuries, loss of two (2) years for a wrongful conviction, economic loss, time out of society, and time

from family and friends.

Wherefore, the Plaintiff prays for a trial by jury and that a judgment for compensatory and punitive damages be entered against each Defendant for \$5,000,000.00 and \$10,000,000.00 respectively.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

While incarcerated on the false charge the Plaintiff experienced migraine headaches regularly. The Plaintiff also experienced stomach ulcers as a result of being confined unlawfully.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

The Plaintiff sues each Defendant in his/her individual and official capacity.

The Plaintiff seeks compensatory damage in the amount of \$5,000,000.00 from each Defendant. The Plaintiff also seeks punitive damages in the amount of \$10,000,000.00 from each Defendant.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1st day of October, 2017.

Signature of Plaintiff x Ryan G. Little
Mailing Address 3381 Holme Avenue
Philadelphia, PA 19114
Telephone Number _____
Fax Number (if you have one) _____
E-mail Address _____

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this 1st day of October, 2017, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: x Ryan G. Little
Inmate Number _____